

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:)	
)	
Lucas Sumitomo Brakes, Inc.)	FINDING OF VIOLATION
Lebanon, Ohio)	
)	EPA-5-99-OH-2
Proceedings Pursuant to)	
Section 113 (a)(3) of the)	
Clean Air Act,)	
42 U.S.C. § 7413(a)(3))	
)	

FINDING OF VIOLATION

The United States Environmental Protection Agency (U.S. EPA), by authority duly delegated to the undersigned, hereby notifies the State of Ohio and Lucas Sumitomo Brakes, Inc. (Lucas Sumitomo) that U.S. EPA finds, pursuant to Section 113(a)(3) of the Clean Air Act (Act), 42 U.S.C. § 7413(a)(3), that the hard chrome electroplating facility, located at 1650 Kingsview Drive in Lebanon, Ohio is in violation of Section 112 of the Act, 42 U.S.C. § 7412, and regulations promulgated thereunder setting forth National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Chromium Emissions from Hard and Decorative Electroplating and Chromium Anodizing Tanks (Chrome Plating NESHAP), 40 C.F.R. § 63.340-347. Specifically, Lucas Sumitomo is in violation of the Chrome Plating NESHAP as follows:

- 1) Establishing the site specific parameter for velocity pressure 40 C.F.R. § 63.343(c)(2)(i) and 40 C.F.R. § 63.344(d)(4).

Lucas Sumitomo has a hard chrome electroplating tank that uses a packed bed scrubber system to reduce chromium emissions. 40 C.F.R. § 63.343(c)(2)(i) requires that such facilities establish, as site specific operating parameters, a velocity pressure at the inlet of the scrubber system (velocity pressure) and a pressure drop across the scrubber system (pressure drop), at which the system is operating, during the initial stack test when compliant chromium emission levels are demonstrated. 40 C.F.R. § 63.344(d)(4) describes how a source shall establish the site specific velocity pressure. Lucas Sumitomo's failure to correctly measure velocity pressure during the initial stack test on January 14, 1997, constitutes a violation of these rules.

- 2) Monitoring and recordkeeping of packed bed scrubber operating parameters 40 C.F.R. § 63.343(c)(2)(ii) and 40 C.F.R. § 63.346(b)(8).

40 C.F.R. § 63.343(c)(2)(ii) requires that, beginning 180 days after January 25, 1997, hard chrome electroplaters using a packed bed scrubber system monitor the velocity pressure and the pressure drop once each day the affected source is in operation. Lucas Sumitomo's failure to monitor velocity pressure correctly until sometime after January 28, 1998, constitutes a violation of 40 C.F.R. § 63.343(c)(2)(ii). 40 C.F.R. § 63.346(b)(8) requires that, beginning 180 days after January 25, 1997, hard chrome electroplaters maintain records of monitoring data that is required at 40 C.F.R. § 63.343(c) and is used to demonstrate compliance with the emissions standard. Lucas Sumitomo's failure to keep records of monitoring data for pressure drop until November 5, 1997, and of velocity pressure until sometime after January 28, 1998, constitutes a violation of 40 C.F.R. § 63.346(b)(8).

- 3) Acceptable range of operation for pressure drop 40 C.F.R. § 63.343(c)(2)(ii).

40 C.F.R. § 63.343(c)(2)(ii) establishes a compliant range of ± 1 inches of water column (in W.C.) of the pressure drop value from the average established during the initial performance test as required at 40 C.F.R. § 63.343(c)(2)(i). Lucas Sumitomo's failure to operate its electroplating tank within the allowable range for pressure drop (Attachment 1) constitutes a violation of 40 C.F.R. § 63.343(c)(2)(ii).

- 4) Monitoring of surface tension 40 C.F.R. § 63.343(c)(5)(ii)(B).

40 C.F.R. § 63.343(c)(5)(ii)(B) requires that, beginning 180 days after January 25, 1997, hard chrome electroplaters using a wetting agent to reduce chromium emissions monitor the surface tension of the electroplating bath once every 40 hours of tank operation. Lucas Sumitomo's failure to monitor the surface tension of the electroplating bath a minimum of once every 40 hours of tank operation (Attachment 2) constitutes a violation of 40 C.F.R. § 63.343(c)(5)(ii)(B).

- 5) Maximum surface tension allowed during source operation 40 C.F.R. § 63.343(c)(5)(ii)(B).


40 C.F.R. § 63.343(c)(5)(ii)(B) establishes the surface tension measured during the initial stack test (in dynes/cm) as the

maximum compliant level. Lucas Sumitomo's failure to maintain the surface tension of the electroplating bath below this maximum compliant level (Attachment 3) constitutes a violation of 40 C.F.R. § 63.343(c)(5)(ii)(B).

- 6) Notification of compliance status report
40 C.F.R. § 63.347(e)(2)(iv).

40 C.F.R. § 63.347(e)(2)(iv) requires that hard chrome electroplaters include, in their notification of compliance status report, the specific operating parameter value, or range of values, that corresponds to compliance with the applicable emission limit for each monitored parameter required at 40 C.F.R. § 63.343(c). Lucas Sumitomo's failure to include a value for velocity pressure and correctly report the value of the surface tension (corresponding to compliant chromium emissions during their initial stack test) in its notification of compliance status report of February 14, 1997, constitute violations of 40 C.F.R. § 63.347(e)(2)(iv).

12/30/98
Date



Stephen Rothblatt, Acting Director
Air and Radiation Division

Attachment 1

Compliant Pressure Drop Range Violations

<u>Date</u>	<u>Recorded Pressure Drop (in W.C.)</u>	<u>Compliant Range as Reported by Facility in Notification of Compliance Status Report (in W.C.)</u>
11/13/97	2.6	0.5 to 2.5
11/14/97	2.6	0.5 to 2.5
11/18/97	2.6	0.5 to 2.5
12/02/97	3.0	0.5 to 2.5
12/06/97	3.0	0.5 to 2.5
12/08/97	3.0	0.5 to 2.5
12/09/97	3.0	0.5 to 2.5
12/12/97	3.0	0.5 to 2.5
12/15/97	3.0	0.5 to 2.5
01/14/98	3.5	0.5 to 2.5

Attachment 2

Instances When the Surface Tension Was Monitored Less Than Once Every 40 Hours of Tank Operation

Time When Last Surface Tension Reading Was Taken	Time When Next Surface Tension Reading Was Taken	Minimum Amount of Tank Operating Hours Between Readings	Maximum Number of Tank Operating Hours Allowed Between Readings
7/28/97, 2:00	8/14/97, 10:00	> 132.9	40
8/19/97, 2:00	9/11/97, 12:45	> 200.2	40
9/15/97, 11:00	10/7/97, 1:30	> 197.7	40
10/7/97, 1:30	10/21/97, 2:00	> 232.5	40
10/21/97, 2:00	11/13/97, 2:45am	> 208.6	40
11/13/97, 10:00	11/20/97, 6:00am	> 43.3	40
11/20/97, 6:00am	12/3/97, 1:30pm	> 68.5	40

Attachment 3

Exceedances of the Maximum Allowable Surface Tension of the Electroplating Bath

<u>Date</u>	<u>Recorded Surface Tension (dynes/cm)</u>	<u>Actual Maximum Compliant Surface Tensions as Indicated by Initial Stack Test Report (dynes/cm)</u>
01/30/97	41.40	41.05
01/31/97	43.12	41.05
01/31/97	41.32	41.05
02/05/97	41.40	41.05
02/07/97	41.70	41.05
02/08/97	41.40	41.05
02/11/97	43.50	41.05
04/09/97	41.40	41.05
04/14/97	43.70	41.05
01/07/98	41.40	41.05
05/05/98	42.00	41.05

CERTIFICATE OF MAILING

I, Shwanda Mayo, do hereby certify that a Finding of Violation was sent by Certified Mail, Return Receipt Requested, to:

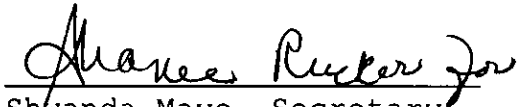
Geoff Hearsum, President
Lucas Sumitomo Brakes
1650 Kingsview Drive
Lebanon, Ohio 45036

I also certify that copies of the Finding of Violation were sent by first class mail to:

Robert Hodanbosi, Chief
Division of Air Pollution Control
Ohio Environmental Protection Agency
Lazarus Government Center
P.O. Box 1049
Columbus, Ohio 43216-1049

Cory Chadwick, Director
Hamilton County
Department of Environmental Services
1632 Central Parkway
Cincinnati, Ohio

on the 31 day of December, 1998.


Shwanda Mayo, Secretary
AECAS, (MN/OH)

CERTIFIED MAIL RECEIPT NUMBER: P188 570393